## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES, et al.,	)	
Plaintiffs,	)	
V.	) No	. 1:23-cv-00108-LMB-JFA
GOOGLE LLC,	)	
Defendant.	)	

# JOINT MOTION FOR ENTRY OF STIPULATION AND ORDER REGARDING EXPERT DISCOVERY

- 1. The parties, through their undersigned counsel, hereby respectfully move for the entry of a stipulation and order in the above-captioned action. The grounds for this joint motion are as follows:
- 2. Plaintiffs United States, the Commonwealth of Virginia, and the States of California, Colorado, Connecticut, New Jersey, New York, Rhode Island, and Tennessee ("Plaintiffs") initiated this action on January 24, 2023, against defendant Google LLC, alleging violations of the antitrust laws. ECF 1.
- 3. As part of the discovery process, the parties anticipate exchanging expert witness reports and other materials pertaining to expert witnesses.
- 4. In order to facilitate the efficient and expeditious conduct of expert discovery, the parties respectfully request that this Court enter the attached stipulation and proposed order, which sets forth agreed-upon procedures that shall be followed with respect to expert discovery. Dated: April 12, 2023

## Respectfully submitted,

#### FOR THE UNITED STATES:

JESSICA D. ABER United States Attorney

/s/ Gerard Mene

GERARD MENE Assistant U.S. Attorney 2100 Jamieson Avenue Alexandria, VA 22314 Telephone: (703) 299-3777 Facsimile: (703) 299-3983

Email: Gerard.Mene@usdoj.gov

/s/ Julia Tarver Wood

JULIA TARVER WOOD
/s/ Aaron M. Teitelbaum
AARON M. TEITELBAUM

Senior Litigation Counsel

United States Department of Justice Antitrust Division 450 Fifth Street NW, Suite 7100 Washington, DC 20530 Telephone: (202) 307-0077

Fax: (202) 616-8544

Email: Julia.Tarver.Wood@usdoj.gov

#### FOR DEFENDANT GOOGLE LLC:

/s/ Craig C. Reilly

CRAIG C. REILLY (VSB # 20942)

209 Madison Street Alexandria, VA 22314 Telephone: (703) 549-5354 Facsimile: (703) 549-5355

Email: craig.reilly@ccreillylaw.com

Eric Mahr (pro hac vice) Tyler Garrett (VSB # 94759) FRESHFIELDS BRUCKHAUS DERINGER US LLP 700 13th Street NW, 10th Floor

Washington, DC 20005 Telephone: (202) 777-4500 Facsimile: (202) 777-4555

Email: eric.mahr@freshfields.com

### FOR THE PLAINTIFF STATES:

JASON S. MIYARES Attorney General of Virginia

/s/ Andrew N. Ferguson
ANDREW N. FERGUSON
Solicitor General
STEVEN G. POPPS
Deputy Attorney General
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia 202 North Ninth Street Richmond, VA 23219 Telephone: (804) 692-0485

Facsimile: (804) 786-0122 Email: <a href="mailto:thenry@oag.state.va.us">thenry@oag.state.va.us</a>

Attorneys for the Commonwealth of Virginia and local counsel for the States of California, Colorado, Connecticut, New Jersey, New York, Rhode Island, and Tennessee